

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

2009 JUL 23 PM 1:09

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION
COLUMBUS

UNITED STATES OF AMERICA :

vs. :

NO. 2:09-cr-178

18 U.S.C. §2

CHRISTOPHER M. JONES :

18 U.S.C. §371

(Counts 1-10, 12-20)

18 U.S.C. §1028A(a)(1)

18 U.S.C. §1344

YOLANDA L. JONES

18 U.S.C. §1708

(Counts 4-9, 11-18)

42 U.S.C. §408(a)(7)(B)

Judge MAMBLEY

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT 1

1. Beginning on or about March 7, 2005, and continuing thereafter until on or about the date of the return of this Indictment, in the Southern District of Ohio, defendant CHRISTOPHER M. JONES, devised a scheme and artifice to defraud Emerald Bank of Dublin, 6215 Perimeter Drive, Dublin, Ohio, a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of Emerald Bank by means of false and fraudulent pretenses and representations.

2. As part of the scheme and artifice to defraud and to obtain money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations, defendant CHRISTOPHER M. JONES applied for a loan from Emerald Bank for the purchase of a vehicle, representing that he was a self-employed electrician.

3. As part of the scheme and artifice to defraud, defendant CHRISTOPHER M. JONES applied for a loan from Emerald Bank for the purchase of a vehicle, using false and fraudulent social security numbers.

4. As further part of the scheme and artifice to defraud, defendant CHRISTOPHER M. JONES, represented on his loan application, that was subsequently approved, that the purchase price of the vehicle was \$10,618.98, and a down payment of \$2,785.98 was made, with the balance due of \$7,833.00.

5. As further part of the scheme and artifice to defraud, defendant CHRISTOPHER M. JONES, used a two-party check to pay the down payment on the vehicle and the check was returned to the dealership, Bob McDorman Chevrolet, Inc. because of non-sufficient funds.

6. As further part of his scheme and artifice to defraud, defendant CHRISTOPHER M. JONES made the first three monthly payments to Emerald Bank and then stopped making the payments.

7. As further part of his scheme and artifice to defraud, defendant CHRISTOPHER M. JONES has not made contact with Emerald Bank despite repeated attempts to contact him through addresses or phone numbers he provided to the Bank.

8. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on March 7, 2005, in the Southern District of Ohio defendant CHRISTOPHER M. JONES, willfully and knowingly provided false information to Emerald Bank of Dublin regarding his employment, his social security number,

and his address, and thereafter failed to make payments on a loan he received from Emerald Bank.

In violation of 18 U.S.C. §1344.

COUNT 2

1. On or about March 7, 2005, in the Southern District of Ohio, defendant CHRISTOPHER M. JONES, with intent to deceive, for the purpose of obtaining a loan, falsely represented to Emerald Bank, Dublin, Ohio, that 273-04-9885 was his Social Security account number which had been assigned to him by the Commissioner of Social Security, when in fact, as defendant CHRISTOPHER M. JONES well knew, 273-04-9885 was not the Social Security account number which had been assigned to him.

In violation of 42 U.S.C. §408(a)(7)(B).

COUNT 3

1. On or about April 1, 2005, in the Southern District of Ohio, defendant CHRISTOPHER M. JONES, with intent to deceive, for the purpose of obtaining car registrations, falsely represented to the Ohio Bureau of Motor Vehicles, that his name was Christopher Montez Jones II and that 273-04-9705 was his Social Security account number which had been assigned to him by the Commissioner of Social Security, when in fact, as defendant CHRISTOPHER M. JONES well knew, 273-04-9705 was not the Social Security account number which had been assigned to him.

In violation of 42 U.S.C. §408(a)(7)(B).

COUNT 4

1. On or about October 7, 2005, in the Southern District of Ohio, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, did unlawfully have in their possession three envelopes containing checks addressed to an individual at 3400 Calimero Drive, Apt. A, Columbus, Ohio 43224, which they knew to have been stolen from an authorized depository for mail matter located at 3400 Calimero Drive, Apt. A, Columbus, Ohio.

In violation of 18 U.S.C. §1708 and §2.

COUNT 5

1. From on or about October 19, 2005, and continuing thereafter until on or about November 26, 2007, the exact dates being unknown, in the Southern District of Ohio and elsewhere, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, together with diverse other persons, both known and unknown to the Grand Jury but not charged in this Indictment, knowingly and willfully conspired and agreed together and with each other to commit offenses against the United States, to wit, to knowingly execute or attempt to execute a scheme to defraud federally insured financial institutions, including but not limited to Columbus Metro Federal Credit Union, National City Bank, and J.P. Morgan Chase, with the intent to obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of such institutions by means of false and fraudulent pretenses and representations, in violation of Title 18, United States Code section 1344.

THE CONSPIRACY AND ITS OBJECTS

2. It was the object of the conspiracy among and between the aforesaid defendants, CHRISTOPHER M. JONES and YOLANDA L. JONES, together with diverse other

persons both known and unknown to the Grand Jury but not charged in this Indictment, (a) to purchase items on E-Bay with counterfeit cashier's checks which depicted nonexistent account numbers, (b) to open checking accounts using fraudulent identifiers, including social security numbers, (c) to deposit counterfeit payroll checks into those accounts and withdraw funds before being detected in order to enable the conspirators to defraud the financial institutions involved and to obtain money, funds, credits, assets, securities or other property owned by, or under the custody of control of those financial institutions.

MANNER AND MEANS OF THE CONSPIRACY

3. The manner and means of the conspiracy were as follows:

(a) One or more of the conspirators would open a checking account with a financial institution, typically using fraudulent information;

(b) One or more of the conspirators would negotiate counterfeit cashier's checks which depicted the legitimate routing number of the financial institution, but contained nonexistent account numbers;

(c) One or more of the conspirators would negotiate counterfeit payroll checks;

(d) One or more of the conspirators would order items on E-Bay and pay for the items with the counterfeit cashier's check;

(e) One or more of the conspirators would pay credit card bills with the counterfeit cashier's check;

(f) One or more of the conspirators would order items from various catalogs and pay for the items with the counterfeit cashier's check;

(g) One or more of the conspirators would apply for credit cards using fraudulent information.

OVERT ACTS

4. In furtherance of the conspiracy, and to effect the objects thereof, at least one of the following overt acts, among many other overt acts, were committed in the Southern District of Ohio and elsewhere:

- (1) On or about August 10, 2006, defendant CHRISTOPHER M. JONES, deposited a counterfeit check of James Sinard into defendant CHRISTOPHER JONES' account at Columbus Metro Federal Credit Union, said check being number 1460, in the amount of \$2,800.00.
- (2) On or about December 10, 2006, defendant CHRISTOPHER M. JONES purchased merchandise on E-Bay, specifically speakers and an amplifier, at The Deep Discount, using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 5889649, in the amount of \$479.98.
- (3) On or about December 10, 2006, defendant CHRISTOPHER M. JONES purchased merchandise on E-Bay, at Road Entertainment, Inc., using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 5889618, in the amount of \$84.99.
- (4) On or about December 10, 2006, defendant CHRISTOPHER M. JONES purchased merchandise on E-Bay, at High In Store, using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 5889647, in the amount of \$14.95.
- (5) On or about December 13, 2006, defendant CHRISTOPHER M. JONES purchased merchandise at Dell Catalog Sell LP, using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 788263, in the amount of \$1,391.30.

- (6) On or about December 15, 2006, a conspirator not named as a defendant in this Indictment, purchased a 2002 Hyundai at Budget Resale, Inc., 4355 Williams Road, Groveport, Ohio, using a counterfeit personal check for the down payment, purportedly drawn on an account at CME Federal Credit Union, said check being check number 2101 in the amount of \$700.00.
- (7) On or about December 20, 2006, defendant YOLANDA L. JONES made a monthly payment to Capitol One, account number 4862-3672-2064-0868 using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 6887224, in the amount of \$606.61.
- (8) On or about December 20, 2006, defendant CHRISTOPHER M. JONES made a monthly payment to Capitol One, account number 4862-3671-6462-5560 using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 6887223, in the amount of \$617.46.
- (9) On or about December 21, 2006, a conspirator not named as a defendant in this Indictment, made a monthly payment to Citi Cards, account number 5424-1810-0762-6190 using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 5369852, in the amount of \$2,084.13.
- (10) On or about December 27, 2006, defendant CHRISTOPHER M. JONES purchased merchandise on E-Bay, at Cellpoint, Inc., using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 895654, in the amount of \$328.99.
- (11) On or about January 4, 2007, defendant CHRISTOPHER M. JONES purchased merchandise on E-Bay, specifically a car bumper, at Brothers Automotive, 7275 W. 162nd Street, Stillwater, Kansas, using a counterfeit cashier's check of CME Federal Credit Union, said check being check number 5889649, in the amount of \$679.00.

In violation of 18 U.S.C. §371.

COUNT 6

1. Beginning on or about October 19, 2005 and continuing thereafter until on or about January 10, 2007, in the Southern District of Ohio and elsewhere, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, devised a scheme and artifice to defraud CME Federal Credit Union, a financial institution with deposits insured by the National Credit Union Share Insurance Fund, and to obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of CME Federal Credit Union by means of false and fraudulent pretenses and representations.

2. As part of the scheme and artifice to defraud and to obtain money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES opened checking account, number 000449469, at CME Federal Credit Union, 365 S. Fourth Street, Columbus, Ohio.

3. As part of the scheme and artifice to defraud, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, presented and caused to be presented for payment to various vendors counterfeit, false, and fictitious checks.

4. As further part of the scheme and artifice to defraud, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, deposited and caused to be deposited counterfeit checks of CME Federal Credit Union wherein the routing number on the cashier's checks for CME Federal Credit Union was correct, but all the account numbers were fictitious.

5. As further part of the scheme and artifice to defraud, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, deposited and caused to be deposited

into their account at CME Federal Credit Union counterfeit payroll checks of a marketing company located in Mobile, Alabama, in addition to other counterfeit personal checks of individuals.

6. As further part of his scheme and artifice to defraud, defendant CHRISTOPHER M. JONES and YOLANDA L. JONES, would then withdraw money from the account before the fraudulent deposit or transaction was detected.

7. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on or about August 10, 2006, in the Southern District of Ohio, defendant CHRISTOPHER M. JONES, willfully and knowingly deposited a counterfeit check of James Sinard, check no. 1460, in the amount of \$2,800.00 into defendant CHRISTOPHER M. JONES' checking account at CME Federal Credit Union, 365 S. Fourth Street, Columbus, Ohio.

In violation of 18 U.S.C. §1344 and §2.

COUNT 7

1. The Grand Jury realleges and incorporates herein by reference those allegations contained in paragraphs 1 through 6 of Count 6 of this Indictment.

2. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on December 10, 2006, defendant CHRISTOPHER M. JONES, willfully and knowingly presented to The Deep Discount, Road Entertainment, Inc., and High In Store, for payment of items ordered on E-Bay, three counterfeit

cashier's checks, nos. 5889649, 5889618 and 5889647 respectively, in the amounts of \$479.98, \$84.99, and \$14.95, all drawn on a nonexistent account at CME Federal Credit Union, 365 S. Fourth Street, Columbus, Ohio.

In violation of 18 U.S.C. §1344 and §2.

COUNT 8

1. The Grand Jury realleges and incorporates herein by reference those allegations contained in paragraphs 1 through 6 of Count 6 of this Indictment.

2. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on December 13, 2006, defendant CHRISTOPHER M. JONES, willfully and knowingly presented to Dell Catalog Sell LP, for payment of items ordered on E-Bay, a counterfeit cashier's check, no. 788263, in the amount of \$1,391.30, drawn on a nonexistent account at CME Federal Credit Union, 365 S. Fourth Street, Columbus, Ohio.

In violation of 18 U.S.C. §1344 and §2.

COUNT 9

1. The Grand Jury realleges and incorporates herein by reference those allegations contained in paragraphs 1 through 6 of Count 6 of this Indictment.

2. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on December 20, 2006, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, willfully and knowingly presented to

Capitol One for monthly payments on credit card accounts, two counterfeit cashier's checks, nos. 6887223 and 6887224, in the amounts of \$617.46 and \$606.61 respectively, each drawn on a nonexistent account at CME Federal Credit Union, 365 S. Fourth Street, Columbus, Ohio.

In violation of 18 U.S.C. §1344 and §2.

COUNT 10

1. On or about December 20, 2006, in the Southern District of Ohio, defendant CHRISTOPHER M. JONES, with intent to deceive, for the purpose of paying his credit card account, falsely represented to Capitol One, that 273-04-9228 was his Social Security account number which had been assigned to him by the Commissioner of Social Security, when in fact, as defendant CHRISTOPHER M. JONES well knew, 273-04-9228 was not the Social Security account number which had been assigned to him.

In violation of 42 U.S.C. §408(a)(7)(B).

COUNT 11

1. On or about December 20, 2006, in the Southern District of Ohio, defendant YOLANDA L. JONES, with intent to deceive, for the purpose of paying her credit card account, falsely represented to Capitol One, that 273-04-9226 was her Social Security account number which had been assigned to her by the Commissioner of Social Security, when in fact, as defendant YOLANDA L. JONES well knew, 273-04-9226 was not the Social Security account number which had been assigned to her.

In violation of 42 U.S.C. §408(a)(7)(B).

COUNT 12

1. The Grand Jury realleges and incorporates herein by reference those allegations contained in paragraphs 1 through 6 of Count 6 of this Indictment.

2. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on or about December 21, 2006, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, willfully and knowingly caused to be presented to Citi Cards, for monthly payment on a credit card account, a counterfeit cashier's check, no. 5369852, in the amount of \$2,084.13, drawn on a nonexistent account at CME Federal Credit Union, 365 S. Fourth Street, Columbus, Ohio.

In violation of 18 U.S.C. §1344 and §2.

COUNT 13

1. The Grand Jury realleges and incorporates herein by reference those allegations contained in paragraphs 1 through 6 of Count 6 of this Indictment.

2. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on or about December 27, 2006, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, willfully and knowingly presented to Cellpoint, Inc., for payment of items ordered on E-Bay, a counterfeit cashier's check, no. 895654, in the amount of \$328.99, drawn on a nonexistent account at CME Federal Credit Union, 365 S. Fourth Street, Columbus, Ohio.

In violation of 18 U.S.C. §1344 and §2.

COUNT 14

1. The Grand Jury realleges and incorporates herein by reference those allegations contained in paragraphs 1 through 6 of Count 6 of this Indictment.

2. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on or about January 4, 2007, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, willfully and knowingly presented to Brothers Automotive, for payment of items ordered on E-Bay, a counterfeit cashier's check, no. 5889649, in the amount of \$679.00, drawn on a nonexistent account at CME Federal Credit Union, 365 S. Fourth Street, Columbus, Ohio.

In violation of 18 U.S.C. §1344 and §2.

COUNT 15

1. The Grand Jury realleges and incorporates herein by reference those allegations contained in paragraphs 1 through 6 of Count 6 of this Indictment.

2. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on or about January 9, 2007, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, willfully and knowingly caused to be deposited into an account at CME Federal Credit Union a counterfeited security, no. 895654, of Outreach Marketing, Inc., 1123 Lifeline Ct., Mobile, Alabama, made payable to Shannon Brooks, in the amount of \$1,569.33, drawn on an account at AmSouth Bank.

In violation of 18 U.S.C. §1344 and §2.

COUNT 16

1. Beginning on or about September 7, 2006, and continuing thereafter until on or about November 26, 2007, in the Southern District of Ohio and elsewhere, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, devised a scheme and artifice to defraud J.P. Morgan Chase, a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of J.P. Morgan by means of false and fraudulent pretenses and representations.

2. As part of the scheme and artifice to defraud and to obtain money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations, defendant CHRISTOPHER M. JONES opened a checking account, number 723967741, at J.P. Morgan Chase on September 7, 2006, using a false and fraudulent social security number.

3. As further part of the scheme and artifice to defraud, defendant CHRISTOPHER M. JONES and YOLANDA L. JONES, presented and caused to be presented for payment to various vendors counterfeit, false, and fictitious checks.

4. As further part of the scheme and artifice to defraud, defendant CHRISTOPHER M. JONES, deposited and caused to be deposited into his account at J.P. Morgan Chase counterfeit payroll checks of a marketing company located in Mobile, Alabama.

5. As further part of his scheme and artifice to defraud and to obtain money, funds, assets, securities, or other property by means of false and fraudulent pretenses and representations, defendant CHRISTOPHER M. JONES would then withdraw money from the

account before the fraudulent deposit or transaction was detected.

6. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on or about October 27, 2006, in the Southern District of Ohio defendant CHRISTOPHER M. JONES, willfully and knowingly deposited into his account at J.P. Morgan Chase a counterfeit security, no. 895652, of Outreach Marketing Inc., 10023 Lifeline Ct., Mobile, Alabama, made payable to Christopher Jones, in the amount of \$7,289.26, purportedly drawn on an account at AmSouth Bank.

In violation of 18 U.S.C. §1344 and §2.

COUNT 17

1. The Grand Jury realleges and incorporates herein by reference those allegations contained in paragraphs 1 through 5 of Count 16 of this Indictment.

2. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on or about November 10, 2006, in the Southern District of Ohio, defendant CHRISTOPHER M. JONES, willfully and knowingly deposited into his account at J.P. Morgan Chase a counterfeit security, no. 896577, of Outreach Marketing Inc., 10023 Lifeline Ct., Mobile, Alabama, made payable to Chris Jones, in the amount of \$3,269.22, purportedly drawn on an account at AmSouth Bank.

In violation of 18 U.S.C. §1344.

COUNT 18

1. Beginning on or about November 16, 2007, and continuing on to on or about December 1, 2007, in the Southern District of Ohio and elsewhere, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES, devised a scheme and artifice to defraud National City Bank, a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of National City Bank by means of false and fraudulent pretenses and representations.

2. As part of the scheme and artifice to defraud and to obtain money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations, defendant CHRISTOPHER M. JONES opened checking account, no. 129012408, and savings account, number 267583630, at National City Bank on November 16, 2007 using a false and fraudulent social security number.

3. As further part of the scheme and artifice to defraud, defendant CHRISTOPHER M. JONES, deposited and caused to be deposited into his account at National City Bank counterfeit payroll checks of a company located in Tiffin, Ohio, in addition to counterfeit personal checks.

4. As further part of the scheme and artifice to defraud and to obtain money, funds, assets, securities, or other property by means of false and fraudulent pretenses and representations, defendants CHRISTOPHER M. JONES and YOLANDA L. JONES would then withdraw money from the account before the fraudulent deposit or transaction was detected.

5. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on or about November 26, 2007, in the Southern District of Ohio, defendant CHRISTOPHER M. JONES, willfully and knowingly deposited into his account at National City Bank a counterfeited security, no. 08941962, of Webster's Industries, 325 Hall Street, Tiffin, Ohio, made payable to Kimberly Jones, in the amount of \$3,892.44, purportedly drawn on account at US Bank, along with three personal non-sufficient funds checks, nos. 105, 121, and 122 in the amounts of \$1,449.00, \$1,100.00, and \$1,150.00, drawn on an account of defendant YOLANDA L. JONES at Washington Mutual Bank.

In violation of 18 U.S.C. §1344 and §2.

COUNT 19

1. On or about November 16, 2007, in the Southern District of Ohio, the defendant, CHRISTOPHER M. JONES during and in relation to a felony violation, that is, knowingly executing and attempting to execute a scheme and artifice to defraud a financial institution with deposits insured by the Federal Deposit Insurance Corporation. and with specific intent of obtaining money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, in violation of 18 U.S.C. §1344, the defendant CHRISTOPHER M. JONES, knowingly transferred, possessed, or used, without lawful authority, a means of identification of another person, to wit, the social security number of one Christopher Montez Jones Jr., the minor child of defendant CHRISTOPHER M. JONES, in order

to open a checking and savings account at National City Bank, 4659 E. Main Street, Columbus, Ohio.

In violation of 18 U.S.C. §1028A(a)(1).

COUNT 20

I. On or about May 4, 2007, in the Southern District of Ohio, defendant CHRISTOPHER M. JONES, with intent to deceive, for the purpose of obtaining a state of Ohio identification card, falsely represented to the Ohio Bureau of Motor Vehicles, that his name was Maurice Christopher Jones and that 291-11-0090 was his Social Security account number which had been assigned to him by the Commissioner of Social Security, when in fact, as defendant CHRISTOPHER M. JONES well knew, 291-11-0090 was not the Social Security account number which had been assigned to him.

In violation of 42 U.S.C. §408(a)(7)(B).

A TRUE BILL.

/s/ _____
FOREPERSON

GREGORY G. LOCKHART
UNITED STATES ATTORNEY


GARY L. SPARTIS
DEPUTY CRIMINAL CHIEF